



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT AGENCY  
HEADQUARTERS, UNITED STATES ARMY AREA III SUPPORT ACTIVITY  
UNIT # 15716  
APO AP 96271-5716

IMKO-AC-PWE

20 SEP 2008

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: US Army Area III Support Activity Policy Memorandum #57, Environmental Compliance Officer (ECO) Program

**1. REFERENCES.**

- a. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 21 Feb 97.
- b. Department of Army (DA) Pamphlet 200-1, Environmental Protection and Enhancement, 17 January 2002
- c. US Forces Korea (USFK) Pamphlet 200-1, Environmental Governing Standards, 20 October 2004.

**2. PURPOSE.** To establish a unit and organizational environmental representative program that:

- a. Provides trained environmental points of contact at each unit or organization at the various levels of command.
- b. Assures unit and organizational compliance with US Army and Host Nation environmental rules, regulations, and laws

**3. APPLICABILITY.** This policy applies to:

- a. All USA Area III Support Activity Headquarters directorates and organizations, all installation support activities and organizations, and tenant units and organizations.
- b. All active military and reserve components that permanently or temporarily stationed at any installation within Area III.
- c. All appropriated and non-appropriated funded US and Local National civilian employees working permanently or temporarily within Area III.
- d. All Army and Air Force Exchange Service and all Defense Commissary Agency employees working permanently or temporarily within Area III.
- e. All contractors and their employees working within Area III.

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**4. ECO ASSIGNMENT.**

- a. Each brigade, battalion, company, and separate detached units will appoint a primary and alternate ECO in writing on appropriate orders to act as the unit's point of contact (POC) for environmental concerns. This includes all separate Army detachments, units, and detachments from other Armed Forces Branches tenant to USA Area III Support Activity. Forward a copy of the assignment orders to the Directorate of Public Works (DPW), Environmental Division.
  - b. Each Directorate and support activity and organization will appoint a primary and alternate ECO at each level of supervision (i.e. division, branch, shop, etc.) in writing on appropriate orders to act as the organizational POC for environmental concerns. Forward a copy of the assignment orders to the Directorate of Public Works (DPW), Environmental Division.
  - c. All contractors working within USASA Area III daily for 6 months or more will appoint a primary and alternate ECO at each level of supervision in writing to act as POC for environmental concerns. Forward a copy of documentation assigning an employee these responsibilities to DPW, Environmental Division.
  - d. All military units and organizations, regardless of Armed Force Branch, participating in exercises and utilizing any USASA Area III installation, site, Logistics Support Area (LSA) supported by Area III, facility, training area, or range facility longer than 14 days will appoint an ECO to act as POC for environmental concerns. The appointed ECO must contact the DPW, Environmental Division within 2 work days after arrival in USASA Area III with location and other contact information.
- e. ECO Ranks or Grades:
- (1) The minimum recommended rank/grade for primary ECO described in Paragraph 4a and 4d of this policy should be Sergeant First Class (SFC) or E-7. The minimum preferred rank/grade is Second Lieutenant (2LT), Warrant Officer One (W01)
  - (2) Soldiers of lower rank and pay grade may be assigned these duties provided they successfully complete the ECO Certification Course and are given the authority to:
    - (a) Enforce all environmental regulations and policies.
    - (b) Take action to correct environmental deficiencies, but not limited to, requiring higher-ranking personnel to correct a noncompliant issue without any negative reprisals.

(c) Represent and speak for the unit commander concerning environmental matters.

(d) Make unit or organizational decisions concerning environmental matters.

(3) The minimum recommended rank/grade for alternate ECO is Staff Sergeant (SSG) or E-6. The minimum preferred rank/grade is 2LT or W01.

(4) Soldiers of lower rank and pay grade may be assigned these duties provided they successfully complete the ECO Certification Course and are given the authority to:

(a) Enforce all environmental regulations and policies.

(b) Take action to correct environmental deficiencies without any negative reprisals to include, but not limited to, requiring higher-graded personnel to correct a noncompliant issue.

(c) Speak for the supervisor and make organizational decisions concerning environmental matters.

**5. ECO DUTIES AND RESPONSIBILITIES.** The ECO is the unit commander's "eyes and ears" for the unit's environmental programs assuring compliance with all environmental laws, directives, policies, the USFK Pam 200-1, Environmental Governing Standards (EGS), and Army environmental regulations.

a. Advise unit commanders or organizational supervisors on matters related to the implementation of this policy.

b. Advises management in developing and implementing the environmental management and compliance program in their unit or organization.

c. Organizes, plans, and implements an effective environmental management and compliance program at the local level.

d. Develops and maintains Standard Operating Procedures (SOP) for environmental management and compliance program elements.

e. Provides program coordination with USASA Area III Environmental Division.

f. Publicizes environmental management and compliance policies and procedures.

g. Maintains spill response supplies and equipment.

h. Implements and maintains an environmental awareness campaign.

- i. Maintains proficiency in environmental management and compliance topics.
- j. Maintains access to environmental reference publications and regulations, including USASA Area III environmental policies, and applicable Army and USFK rules and regulations.
- k. Inspects or coordinates the periodic inspection of facilities for compliance with applicable environmental policies and regulations.
- l. Coordinates self-conducted facility inspection and program evaluation using the activity and operational checklists.
- m. Documents audit data and tracks corrective actions through final abatement.
- n. Assists management in assuring that all environmental accidents or incidents are investigated and reported in accordance with Environmental Governing Standards (EGS) and USASA Area III policies.
- o. Serves as member of the ECO Council and advisor to environmental work groups as assigned by the unit commander, supervisor, or the USASA Area III Environmental Quality Control Committee (EQCC).
- p. Conducts training, and coordinates and maintains training records of environmental training for unit personnel.
- q. Administers environmental management and compliance programs for applicable functional areas:
  - (1) Hazardous waste storage/disposal
  - (2) Remediation activities
  - (3) Recycling
  - (4) Water quality
  - (5) Wastewater
  - (6) Air pollution
  - (7) Above/underground storage tanks
  - (8) Toxic substances

(9) Cultural resource management

(10) Natural resource management

(11) Pesticide management

(12) Solid waste management

(13) Environmental noise

q. Serves as a technical resource for activities related to the functional areas (e.g. may provide technical expertise for the establishment of local contracts in the functional areas).

r. Serves as the unit or organization Hazardous Waste Manager.

s. Advise unit commanders or organizational supervisors of any environmental problems or potential violation of the environmental rules, regulations, policies, or directives.

t. Maintain competency in accordance with the core competencies described at enclosure.

## 6. ECO TRAINING AND COMPETENCY

a. All personnel assigned as unit primary or alternate ECO must successfully complete a 40-hour Environmental Compliance Officers Certification Course provided by the DPW, Environmental Division within 3 months after assignment.

b. All certified ECOs will be recertified annually by successfully completing an 8-hour ECO Recertification Course provided by the DPW, Environmental Division.

c. If an individual was trained by another installation or similar course, the training can be recognized as equivalent training. To receive credit for previous training the following must be submitted to the DPW Environmental Office Chief:

(1) A signed course completion certificate that includes the date(s) of the training.

(2) A description of the course completed. The course description must be from the training provider.

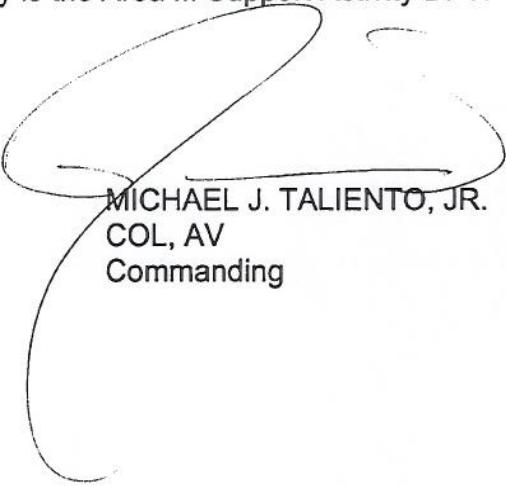
d. The ECO Core Competencies are provided at Enclosure 1 of this policy.

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7. The point of contact for this policy is the Area III Support Activity DPW Environmental Chief, 753-7964.

Encl



MICHAEL J. TALIENTO, JR.  
COL, AV  
Commanding

DISTRIBUTION:  
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# ENVIRONMENTAL COMPLIANCE OFFICER (ECO) CORE COMPETENCIES

## INTRODUCTION:

This core competency document for Environmental Compliance Officers (ECOs) serves many purposes. First, it highlights duties that may be required of personnel serving in this capacity. Commanders and supervisors can refer to it when assessing the needs of their organization for environmental support and it can also be used to ensure the inclusion of pertinent environmental duties in position descriptions for full time and collateral duty assignments. While the document is intended to be all-inclusive, this does not preclude the command from customizing duty assignments to meet the needs of the organization. Therefore, sound management judgment should be applied when using the competency document as a reference for the development of position documentation.

Secondly, the document identifies the technical knowledge, skills, and abilities associated with each of the duties. These are the knowledge, skills, and abilities (KSAs) that personnel must possess in order to perform their functions effectively. Commanders and supervisors are encouraged to review and consider the KSAs when assessing potential candidates in order to assist them in making quality selections for these critical assignments.

The document also identifies required and suggested training that will equip personnel with the required technical competencies. As such, it serves as a developmental tool for soldiers and employees striving to perform at their optimum levels. ECOs are strongly urged to pursue developmental activities related to all of their duties. They need to work with their supervisors when deciding which KSAs they need to develop most in order to perform at an optimum level. This document is intended to provide a framework for making these important professional development decisions.

While this document focuses on the required technical competencies, commanders and supervisors should also be cognizant of the many "soft" competencies that are important in carrying out these critical duties. Among these soft competencies are: interpersonal skills, ability to lead, skill in organizing and prioritizing work, and ability to invoke enthusiasm and buy-in from others. These types of competencies should also be considered when identifying or selecting candidates for these critical positions/roles.

If you have any questions as you utilize this tool, please contact the USASA Area III DPW, Environmental Division.

## I. Provides environmental management and compliance advice to local management

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
-Advises management in developing and implementing the environmental management and compliance program in their unit or organization	1. Basic knowledge of environmental management and compliance standards, regulations, and policies  2. Knowledge of USASA Area III programs, problems, and issues related to environmental management and compliance.  3. Skill in written and interpersonal communication			Employee Performance Enhancement track  Interpersonal Communications COMM7006D-W01  Practical Writing WRIT1110E-W01 Graduate School, USDA, <a href="http://www.grad.usda.gov/Catalog/SUBJ_-AllCourses.cfm">http://www.grad.usda.gov/Catalog/SUBJ_-AllCourses.cfm</a>  USASA Area III ECO Certification Course

Enclosure 1

**II. Coordinates the local environmental management and compliance programs**

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
<ul style="list-style-type: none"> <li>-Organizes, plans, and implements an effective environmental management and compliance program at the local level</li> <li>-Develops and maintains Standard Operating Procedures (SOP) for environmental management and compliance program elements</li> <li>-Provides program coordination with USASA Area III DPW, Environmental Division</li> </ul>	<ul style="list-style-type: none"> <li>4. Skill in evaluating environmental risk factors</li> <li>5. Knowledge of hazard control principles and methods</li> </ul>			USASA Area III ECO Certification Course

**II. Coordinates the local environmental management and compliance programs (Continued)**

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
<ul style="list-style-type: none"> <li>-Publicizes environmental management and compliance policies and procedures</li> <li>-Maintains spill response supplies and equipment</li> <li>-Implements and maintains an environmental awareness campaign</li> <li>-Maintains proficiency in environmental management and compliance topics</li> <li>-Maintains access to environmental reference publications and regulations, including USASA Area III environmental policies, and applicable state and Federal rules and regulations</li> </ul>	<ul style="list-style-type: none"> <li>6. Knowledge of basic elements of organizing, planning, and managing effective environmental and environmental compliance programs</li> <li>7. Knowledge of techniques, supplies, and equipment needed for spill response</li> </ul> <p><i>See I above</i></p>			USASA Area III ECO Certification Course First Responder Operations Level Training IAW 29 CFR 1910.120

### III. Conducts formal and recurring facility inspections

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
<ul style="list-style-type: none"> <li>-Inspects or coordinates the periodic inspection of facilities for compliance with applicable environmental policies and regulations</li> <li>-Coordinates self-conducted facility inspection and program evaluation using the activity and operational checklists</li> <li>-Documents audit data and tracks corrective actions through final abatement</li> </ul>	<ul style="list-style-type: none"> <li>8. Skill in documenting and tracking environmental data for audits, program reviews, and program compliance</li> <li>9. Skill in conducting and coordinating environmental inspections and program evaluations</li> <li>10. Skill in recognizing violations of environmental standards and potential risk factors</li> <li>11. Ability to determine appropriate actions to correct deficiencies</li> </ul> <p><i>See 1, 3 above</i></p>			USASA Area III ECO Certification Course Environmental Performance Assessment System Protocol (EPAS) Training

### IV. Insures all environmental accidents and incidents are investigated and reported

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
<ul style="list-style-type: none"> <li>-Assures all environmental accidents and/or incidents are investigated and reported in accordance with Environmental Governing Standards (EGS) and USASA Area III policies</li> </ul>	<ul style="list-style-type: none"> <li>12. Knowledge of regulatory requirements for investigating and reporting environmental accidents and/or incidents</li> <li>13. Knowledge of violation and mishap causation factors and investigation techniques</li> </ul>			USASA Area III ECO Certification Course

**V. Serves as a member and/or advisor environmental work groups**

<b>Duties</b>	<b>Core Competencies</b>	<b>Apply (Y/N)</b>	<b>% FTE</b>	<b>Training</b>
<p>-Serves as member of the ECO Council</p> <p>-Advisor to the environmental work groups as assigned</p> <p><i>See 3 above.</i></p>	15. Skill in working cooperatively on teams to achieve consensus and accomplish team goals			<p>Jump-Starting High-Performing Teams: The Fundamentals TDEV7021D-W01, Graduate School, USDA, <a href="http://www.grad.usda.gov/Catalog/SUBJ-AllCourses.cfm">http://www.grad.usda.gov/Catalog/SUBJ-AllCourses.cfm</a></p> <p>USASA Area III ECO Certification Course</p>

**VI. Conducts and/or coordinates environmental training**

<b>Duties</b>	<b>Core Competencies</b>	<b>Apply (Y/N)</b>	<b>% FTE</b>	<b>Training</b>
<p>Conducts and/or coordinates and maintains training records of environmental training for work unit employees.</p>	<p>16. Skill in identifying training resources and coordinating general and specialized training to meet local needs</p> <p>17. Skill in preparing training materials and presentations</p> <p>18. Skill in conducting environmental training</p>			<p>Managing Training for Results CDEV9002D-W01, Graduate School, USDA, <a href="http://www.grad.usda.gov/Catalog/SUBJ-AllCourses.cfm">http://www.grad.usda.gov/Catalog/SUBJ-AllCourses.cfm</a></p> <p>USASA Area III ECO Certification Course</p> <p>EPAS Protocol Training</p>

**VII. Administers specialized environmental management program functional areas, as needed.**

Duties	Core Competencies	Apply (Y/N)	% FTE	Training
<p>-Administers environmental management and compliance programs for applicable functional areas</p> <p>✓ hazardous waste storage/disposal</p> <p>✓ remediation activities</p> <p>✓ recycling</p> <p>✓ water quality</p> <p>✓ wastewater</p> <p>✓ air pollution</p> <p>✓ above/underground storage tanks</p> <p>✓ toxic substances</p> <p>✓ cultural resource management</p> <p>✓ natural resource management</p> <p>✓ pesticide management</p> <p>✓ solid waste management</p> <p>✓ NEPA</p> <p>✓ Environmental noise</p>	<p>19. Knowledge of functional area subject matter</p> <p>20. Skill in planning, administering, and evaluating functional activities</p>			<p>OSHA Training Institute, OSHA 24-Hour Hazardous Waste Worker (HAZWOPER) and OSHA 8-Hour Hazardous Waste Worker Refresher, <a href="http://osha.ucsd.edu/ALLHAZCRS.htm">http://osha.ucsd.edu/ALLHAZCRS.htm</a></p> <p>Lawrence Livermore National Laboratory, Environment Safety and Health, Hazards Control Education and Training, <a href="http://www-training.llnl.gov/wbt">http://www-training.llnl.gov/wbt</a></p> <p>Water-Quality Courses, U.S. GEOLOGICAL SURVEY - NATIONAL TRAINING CENTER, <a href="http://training.usgs.gov/ntc/courses/Course_Info/course_catalog.cfm">http://training.usgs.gov/ntc/courses/Course_Info/course_catalog.cfm</a></p> <p>USASA Area III ECO Certification Course</p> <p>EPAS Protocol Training</p> <p>The Environmental Training Center, 415 S. Cooper Ave, Cincinnati, OH <a href="http://www.environmentaltraining.com/welcome.htm">http://www.environmentaltraining.com/welcome.htm</a></p>

**TIME SENSITIVE INITIAL TRAINING REQUIREMENTS:**

Within 60 days of assignment, ECOs shall receive ECO training. The training includes an orientation to the USASA Area III environmental protection program, reviewing basic duties and responsibilities, organization, available resources, USASA Area III policies, and environmental management and media training from one of the following sources:

- a. Environmental Office approved, sponsored, or conducted ECO training.
- b. Any basic environmental management course offered by an accredited college, university, or Federal agency
- c. Any environmental protection program management seminar or class sponsored by a professional environmental organization (i.e., US Environmental Protection Agency, appropriate state environmental agency, etc.).
- d. After initial formal training, ECOs shall receive and document a minimum of 8-hours per year of additional formal and environmental protection program training.